

Clerk, U.S. District Court
Southern District of Texas
FILED

MAR 25 2015

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

UNITED STATES OF AMERICA

v.

DANIEL SANCHEZ
MARIA NELLY DOMINGUEZ

§
§
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§
§
§

CRIMINAL NUMBER

C - 15 - 266

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about March 8, 2015, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

DANIEL SANCHEZ
and MARIA NELLY DOMINGUEZ,

knowingly and in reckless disregard of the fact that aliens had come to, entered, and remained in the United States in violation of law, did knowingly and intentionally conspire and agree together, with each other, and with other persons known and unknown to the Grand Jury, to transport, move, attempt to transport, and attempt to move said aliens within the United States in furtherance of such violation of law by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), and 1324(a)(1)(B)(i).

COUNT TWO

On or about March 8, 2015, in the Corpus Christi Division of the Southern District of Texas and elsewhere within the jurisdiction of the Court, the defendants,

DANIEL SANCHEZ
and MARIA NELLY DOMINGUEZ,


did knowingly and in reckless disregard of the fact that Edel Cuevas-Castro was an alien who had come to, entered, and remained in the United States in violation of law, transport, move, attempt to transport, and attempt to move said alien within the United States in furtherance of such violation of law by means of a motor vehicle.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii),
1324(a)(1)(A)(v)(II), and 1324(a)(1)(B)(ii).

A TRUE BILL:
ORIGINAL SIGNATURE ON FILE
FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY

By:


JEFFREY S. MILLER
Assistant United States Attorney